

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--------------|---|-----------------------------|
| In Re: | : | Bankruptcy No. 21-13216-MDC |
| | : | |
| MICHAEL LUMB | : | |
| | : | |
| | : | Chapter 13 |
| Debtor | : | |
| | : | |

ENTRY OF APPEARANCE AND REQUEST FOR NOTICES

To: Clerk of Courts

PLEASE TAKE NOTICE that Finance of America Holdings, LLC hereby appears in the above-captioned case by its counsel, Kelli A. Lee, Esquire, and Dinsmore & Shohl LLP; counsel hereby enters her appearance pursuant to §1109(b) of Title 11 of the United States Code, 11 U.S.C. §101, et seq. (the “Bankruptcy Code”), and Fed. R. Bankr. P. 9010(b); and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 3017 and 9007 and §§342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon them at the following address:

Kelli A. Lee, Esquire
kelli.lee@dinsmore.com
Dinsmore & Shohl LLP
Six PPG Place, Suite 1300
Pittsburgh, PA 15222
(412) 281-5000 (Phone)
(412) 281-5055 (Fax)

Please take further notice that pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telecopy, telegraph, telex, or otherwise filed or made with regard to the referenced case and all proceedings therein.

This Notice of Appearance and Demand for Service of Papers is not (a) a waiver or release of this party's rights against any person, entity or property; (b) a consent by this party to the jurisdiction of this Court with respect to this case or other cases, if any, commenced in the case against or otherwise involving this party; (c) a waiver or release of this party's right to trial by jury as to any and all matters so triable herein or in other matters or proceedings, if any, commenced in the case against or otherwise involving Innovative or in any case, controversy or proceeding related hereto, whether or not the same be designated legal or private rights and notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. Section 157(b)(2), and whether such jury trial right is pursuant to statute of the United States Constitution; (d) a waiver or release of this party's right to have any and all final orders in any and all non-core matters or proceedings entered only after de novo review by a United States District Court Judge; (e) a waiver of the right to move to withdraw the reference in any proceeding which may be commenced in this case against or otherwise involving this party; or (f) an election of remedy.

DINSMORE & SHOHL LLP

Dated: March 7, 2023

/s/ Kelli A. Lee
Kelli A. Lee, Esquire
PA ID # 309770
kelli.lee@dinsmore.com
Six PPG Place, Suite 1300
Pittsburgh, PA 15222
Telephone: (412) 281-5000
Facsimile: (412) 281-5055

Counsel for Finance of America Holdings, LLC

CERTIFICATE OF SERVICE

I the undersigned hereby certify that a true copy of the foregoing was served upon the all parties of record via the CM/ECF notification system on March 7, 2023.

/s/ Kelli A. Lee
Kelli A. Lee, Esquire